

EXHIBIT A

Justin White v. Vance County Sheriff et. al. Comparisons of Counts in Complaint and Proposed Amended Complaint

<u>COMPLAINT</u>	<u>PROPOSED AMENDED COMPLAINT</u>	
<u>Count I</u> Violation of 42 U.S.C. § 1983 Disparate Treatment Under 42 U.S.C. § 1981 (Against All Defendants)	<u>Count I</u> Violation of 42 U.S.C. § 1983 Disparate Treatment Under 42 U.S.C. § 1981 (Against All Defendants)	No change
<u>Count II</u> Violation of 42 U.S.C. § 1983 Hostile Work Environment Under 42 U.S.C. § 1981 (Against All Defendants)	<u>Count II</u> Violation of 42 U.S.C. § 1983 Hostile Work Environment Under 42 U.S.C. § 1981 (Against All Defendants)	No change
<u>Count III</u> Violation of 42 U.S.C. § 1983 Unlawful Retaliation Under 42 U.S.C. § 1981 (Against All Defendants)	<u>Count III</u> Violation of 42 U.S.C. § 1983 Unlawful Retaliation Under 42 U.S.C. § 1981 (Against All Defendants)	No change
<u>Count IV</u> Violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e- 16a <i>et seq.</i> Disparate Treatment (Against All Defendants)	<u>Count IV</u> Violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e- 16a <i>et seq.</i> Disparate Treatment (Against All Defendants)	No change
<u>Count V</u> Violation of Title VII of Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e-16a <i>et seq.</i>	<u>Count V</u> Violation of Title VII of Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e-16a <i>et seq.</i>	No change

Hostile Work Environment (Against All Defendants)	Hostile Work Environment (Against All Defendants)	
<u>Count VI</u> Violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e-16a <i>et seq</i> Retaliation (Against All Defendants)	<u>Count VI</u> Violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e <i>et seq.</i> Govt. Employees Rights Act of 1991, 42 U.S.C. § 2000e-16a <i>et seq</i> Retaliation (Against All Defendants)	No change
<u>Count VII</u> Breach of Contract (Against the County and VCSO Defendants)	<u>Count VII</u> Breach of Contact (Against the County and VCSO Defendants and Sheriff White)	No change (except now alleged against former sheriff White too)
<u>Count VIII</u> Tortious Interference with Employment and Related Opportunities (Individual Defendants)	<u>Count VIII</u> Tortious Interference with Employment and Related Opportunities (Against Individual Defendants)	No change
<u>Count IX</u> Negligent Retention and Negligent Supervision (Against Individual Defendants Sheriff White and Chief Deputy Bullock)	<u>Count IX</u> Tortious Interference with Prospective Economic Advantage (Against Individual Defendants)	<u>NEW CLAIM</u>
<u>Count X</u> Ratification (Against Individual Defendants Sheriff White and Chief Deputy Bullock)	<u>Count X</u> Intentional Infliction of Emotional Distress (Against Individual Defendants)	<u>NEW CLAIM</u>
<u>Count XI</u> Punitive Damages (All Defendants)	<u>Count XI</u> Negligent Infliction of Emotional Distress	<u>NEW CLAIM</u>

	(Against Individual Defendants)	
	<p><u>Count XII</u> Wrongful Discharge under the Equal Employment Practices Act N.C. Gen. Stat. § 143-422.2 (Against Individual Defendants Sheriff White and Chief Deputy Bullock)</p>	<u>NEW CLAIM</u>
	<p><u>Count XIII</u> Negligent Retention and Negligent Supervision (Against Individual Defendants Sheriff White and Chief Deputy Bullock)</p>	No change (but re-numbered from Count IX in Complaint)
	<p><u>Count XIV</u> Ratification (Against Individual Defendants Sheriff White and Chief Deputy Bullock)</p>	No change (but re-numbered from Count X in Complaint)
	<p><u>Count XV</u> Defamation/Libel (Against All Defendants)</p>	<u>NEW CLAIM</u>
	<p><u>Count XVI</u> Punitive Damages (All Defendants)</p>	No change (but re-numbered from Count XI in Complaint)